

THE ROSEN LAW FIRM, P.A.

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[Proposed] Lead Counsel for Plaintiff and Class

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

WEICHEN LAI, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

PPDAI GROUP INC., JUN ZHANG, TIEZHENG
LI, HONGHUI HU, SHAEFENG GU, RONALD
CAO, CONGLIANG LI, NEIL NAPENG SHEN,
ZEHUI LIU, QIONG WANG, SIMON TAK
LEUNG HO, CREDIT SUISSE SECURITIES
(USA) LLC., CITIGROUP GLOBAL MARKETS
INC., and KEEFE, BRUYETTE & WOODS, INC.,

Defendants.

YOGENDRA GOYAL, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

PPDAI GROUP INC., JUN ZHANG,
TIEZHENG LI, HONGHUI HU, SHAEFENG
GU, RONALD CAO, CONGLIANG LI, NEIL
NAPENG SHEN, ZEHUI LIU, QIONG
WANG, SIMON TAK LEUNG HO, CREDIT
SUISSE SECURITIES (USA) LLC.,
CITIGROUP GLOBAL MARKETS INC., and
KEEFE, BRUYETTE & WOODS, INC.,

Defendants.

CASE No.: 1:18-cv-06716-FB-JO

**NOTICE OF NON-OPPOSITION
TO GOLDEN SECTION HOLDING
CORPORATION'S MOTION TO:
(1) CONSOLIDATE RELATED
ACTIONS; (2) APPOINT LEAD
PLAINTIFF; AND (3) APPROVE
LEAD PLAINTIFF'S SELECTION
OF COUNSEL (DKT. NO. 7)**

CLASS ACTION

CASE No.: 2:19-cv-00168-FB-JO

CLASS ACTION

Lead Plaintiff Movant Golden Section Holding Corporation (“Movant”), by and through its undersigned counsel, files this Notice of Non-Opposition with respect to its pending Motion to: (1) Consolidate Related Actions; (2) Appoint Lead Plaintiff; and (3) Approve Lead Plaintiff’s Selection of Counsel (“Motion”) filed on January 25, 2019 as Docket No. 7. Two competition motions were filed by Jing Lin (“Lin”) (Dkt. No. 9) and Kitty Fong and Yogendra Goyal (“Fong and Goyal”) (Dkt. No. 12).

On February 1, 2019, Lin filed the Notice of Non-Opposition of Jing Lin to Movant Golden Section Holding Corporation’s Competing Lead Plaintiff Motion (Dkt. No. 15). On February 6, 2019, Fong and Goyal filed the Notice of Non-Opposition of Kitty Fong and Yogendra Goyal to Competing Motions for Consolidation, Appointment as Lead Plaintiff and Approval of Counsel (Dkt. No. 16).

Accordingly, there is no opposition to Movant’s Motion. Thus, Movant respectfully requests that the Court decide the Motion on the papers and enter the [Proposed] Order Consolidating Related Actions, Appointing Lead Plaintiff and Lead Counsel submitted as Docket No. 7-1.

Dated: February 8, 2019

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim
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[Proposed] Lead Counsel for Plaintiff and Class

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of February 2019, a true and correct copy of the foregoing **NOTICE OF NON-OPPOSITION TO GOLDEN SECTION HOLDING CORPORATION'S MOTION TO: (1) CONSOLIDATE RELATED ACTIONS; (2) APPOINT LEAD PLAINTIFF; AND (3) APPROVE LEAD PLAINTIFF'S SELECTION OF COUNSEL (DKT. NO. 7)** was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim _____